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*Attorneys for Defendants CNA Long Term
 Disability Plan and Hartford Group Insurance
 Company*

*Attorneys for Defendant CNA Short Term
 Disability Plan*

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

DAVID CAPLAN,

Plaintiff,

vs.

CNA SHORT TERM DISABILITY PLAN;
 CNA LONG TERM DISABILITY PLAN; and
 HARTFORD LIFE GROUP INSURANCE
 COMPANY,

Defendants.

Case No. C06-05865 CW

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND ADR
 COMPLIANCE DATE**

STIPULATION AND [PROPOSED] ORDER TO EXTEND ADR COMPLIANCE DATE
 CASE No. C06-05865 (CW)

1 WHEREAS Plaintiff has noticed a Motion to Modify Scheduling Order and Amend
2 Complaint for June 7, 2007; and

3 WHEREAS the proposed Second Amended Complaint would add two new defendants:
4 CNA Financial Corporation and University Disability Consortium, and would eliminate one
5 defendant: CNA Short Term Disability Plan; and

6 WHEREAS the Court ordered that the parties complete an ADR session by May 15,
7 2007; and

8 WHEREAS completion of an ADR session by May 15, 2007 would not enable the
9 potential new parties to participate if the Court permits Plaintiff to amend the complaint;

10 NOW, THEREFORE, the parties to this action, by and through their undersigned
11 attorneys, hereby stipulate and respectfully request the Court to order as follows:

- 12 1. The deadline to complete the court-ordered ADR session is extended from May
13 15, 2007, until either 45 days after the new Defendants appear or, if the Court
14 does not grant Plaintiff's Motion to Modify Scheduling Order and Amend
15 Complaint, 45 days after the Court denies Plaintiff's motion.

16
17 Dated: April 25, 2007

LEWIS, FEINBERG, LEE,
RENAKER & JACKSON P.C.

18 By: /s/
19 Margaret E. Hasselman
20 Attorneys for Plaintiff

21 Dated: April 25, 2007

SEDGWICK, DETERT, MORAN
& ARNOLD LLP

22 By: /s/
23 Michelle Y. McIsaac
24 Attorneys for Defendants CNA Long Term
25 Disability Plan and Hartford Group
26 Insurance Company
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1 Dated: April 26, 2007

SEYFARTH SHAW LLP

2 By: /s/
3 James M. Nelson
4 Attorneys for Defendant CNA Short Term
Disability Plan

5 PURSUANT TO STIPULATION, IT IS SO ORDERED

6 Dated: 4/30, 2007


7 Honorable Claudia Wilken
8 United States District Court
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